

K R A S K I N, L E S S E & C O S S O N, L L P  
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October 15, 2001

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Revisions of the Commission's Rules To Ensure Compatibility with  
Enhanced 911 Emergency Calling Systems- CC Docket No. 94-102  
Valley Telecommunications, Inc.  
TTY Quarterly Report - Third Quarter 2001

Dear Ms. Salas:

Transmitted herewith, on behalf of Valley Telecommunications, Inc. is its carrier quarterly report on the progress of TTY-digital deployment solutions pursuant to the Commission's *Fourth Report and Order* in this proceeding (CC Docket No. 94-102).

If you have any questions regarding this matter, please contact the undersigned.

By: \_\_\_\_\_  
John Kuykendall  
Derrick Rogers  
Its Attorneys

Attachment

cc: Kris Montieth, Chief, Policy Division, Wireless Telecommunications Bureau  
Pam Gregory, Chief, Disabilities Rights Office, Consumer Information Bureau  
Qualex International (with diskette)

VALLEY TELECOMMUNICATIONS, INC.  
TTY REPORT  
October 10, 2001

**I. Network infrastructure software development**

Valley Telecommunications, Inc. ("Valley Telecommunications") utilizes one Nortel Networks DMS100 switch to provide digital wireless services in certain areas throughout its market. Valley Telecommunications understands that Nortel Networks has completed its development of software and product tests (see letter from Nortel submitted in the July quarterly report of the TTY Forum ("Nortel Letter")).

**II. Handset development and testing plans**

Valley Telecommunications must rely on handset vendors to develop the required handsets. When handsets are available, testing can be performed with area PSAPs to insure compatibility.

**III. Beta testing and lab testing**

Valley Telecommunications must rely on Nortel Networks and handset vendors for initial conformance testing.

**IV. Release and general availability to carriers of network infrastructure software**

Valley Telecommunications understands that Nortel Networks' enabling software load, MTX10, is scheduled for General Availability Week 44, 2001 (see Nortel Letter).

**V. Availability to carriers to full acceptance test units**

Valley Telecommunications understands that Nortel Networks plans to test and confirm the solution performance.

**VI. Efforts toward achieving digital wireless solution capability with enhanced TTY devices**

Valley Telecommunications understands that the solution provided by the MTX10 software load addresses Baudot type messages only. Other capabilities may be included later, after standards are adopted.

**VII. Carrier coordination of testing with PSAP**

See response to item 2. above.

**VIII. Carrier testing activities, including field testing, consumer end-to-end testing, and other necessary tests**

Valley Telecommunications will begin testing activities when the correct software load is installed in the switch and handsets are generally available.

**IX. Retail availability of necessary consumer equipment.**

It is unknown when handsets will be available.

**X. Geographic scope of network infrastructure deployment**

Arizona RSA 6 which covers Cochise, Graham and Greenlee Counties.

Respectfully Submitted,

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Virgil Barnard  
Contract & Compliance Manager